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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	NO. 24-CR-00523 JD
Plaintiff,)	STIPULATION TO EXCLUDE TIME FROM
v.)	OCTOBER 7, 2024 TO NOVEMBER 25, 2024 AND
ISAAC ISRAEL NUNEZ,)	[PROPOSED] ORDER
Defendant.)	

It is hereby stipulated by and between counsel for the United States and counsel for the defendant Isaac Israel Nunez, that a change of plea hearing be scheduled for November 25, 2024, a pre-plea presentence report be ordered, and that time be excluded under the Speedy Trial Act from October 7, 2024 through November 25, 2024.

At the status conference held on October 7, 2024, the government and counsel for the defendant agreed to set this matter for a change of plea hearing on November 25, 2024 and that time be excluded under the Speedy Trial Act so that defense counsel could continue to prepare, including by reviewing the discovery already produced. For this reason, the parties stipulate and agree that excluding time until November 25, 2024 will allow for the effective preparation of counsel. *See* 18 U.S.C.

§ 3161(h)(7)(B)(iv). The parties further stipulate and agree that the ends of justice served by excluding

the time from October 7, 2024 through November 25, 2024 from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

The undersigned Assistant United States Attorney certifies that she has obtained approval from counsel for the defendant to file this stipulation and proposed order.

IT IS SO STIPULATED.

DATED: 10/15/2024

/s/
KRISTINA GREEN
Assistant United States Attorney

DATED: 10/15/2024

/s/
ELIZABETH FALK
Counsel for Defendant Isaac Israel Nunez

~~PROPOSED~~ ORDER

Based upon the facts set forth in the stipulation of the parties and for good cause shown, the Court finds that failing to exclude the time from October 7, 2024 through November 25, 2024 would unreasonably deny defense counsel and the defendant the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). The Court further finds that the ends of justice served by excluding the time from October 7 to November 25, 2024 from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial. Therefore, and with the consent of the parties, IT IS HEREBY ORDERED that the time from October 7, 2024 through November 25, 2024 shall be excluded from computation under the Speedy Trial Act. 18 U.S.C. § 3161(h)(7)(A), (B)(iv). It further ordered that this matter be set for a change of plea hearing on November 25, 2024. The parties' request for Probation to prepare a pre-plea presentence report by December 2, 2024, was not explained and is denied. The Probation Office is requested to begin preparation of a full, post-plea PSR to be submitted to the Court by January 6, 2025.

IT IS SO ORDERED.

DATED: October 21, 2024


JAMES DONATO
United States District Judge

v. 7/10/2018